

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ERIBERTO RAMALES,

Plaintiff,

- against -

LAMDA FOOD INC. d/b/a CAFÉ BRAVO, EPTANISSA
RESTAURANT CORP. d/b/a CAFÉ BRAVO, DEMETRIOS
LIBERATOS a/k/a JIMMY LIBERATOS, and GEORGE
LIBERATOS and any other entities affiliated with or controlled by
LAMDA FOOD INC and EPTANISSA RESTAURANT CORP.

Defendants.

Docket No.: 12-cv-1389 (CM)

**PLAINTIFF'S RULE 26 INITIAL
DISCLOSURES**

Plaintiff ERIBERTO RAMALES, by his attorneys Virginia & Ambinder, LLP, provide the following information, as per Federal Rule of Civil Procedure 26(a)(1)(A-D).

A. The name and, if known, the address of each individual likely to have discoverable information that the Plaintiff may use to support their claims:

Although Plaintiff retains the right to amend this list, Plaintiff names:

1. Eriberto Ramales, c/o Virginia & Ambinder, LLP, 111 Broadway Suite 1403, New York, New York 10006;
2. Demetrios Liberatos a/k/a Jimmy Liberatos at 2835 Bell Boulevard, Bayside, New York 11360; and
3. George Liberatos at 35-41 204th Street, Bayside, New York 11361.

B. A description, by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of Plaintiff and that Plaintiff may use in support of his claims:

Although Plaintiff retains the right to amend this list, Plaintiff lists the following:

1. To varying degrees for the Named Plaintiff, Plaintiff names the following documents: none known to Plaintiff at this time.

2. Plaintiff names the following data compilations: none known to Plaintiff at this time; and

3. Plaintiff names the following tangible things: See response to (B) (1).

C. A computation of any category of damages claimed by Plaintiff:

Plaintiff retains the right to amend this response as necessary. Plaintiff cannot compute any category of damages with any specificity at this time as discovery has not been completed. However, please see Exhibit A attached, which contains approximate damages owed to Plaintiff.

D. Insurance Disclosures

Not applicable.

Dated: New York, New York
March 21, 2012

VIRGINIA & AMBINDER, LLP

By: _____/s/_____

Kara S. Miller, Esq.

Attorneys for Plaintiff

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